

Message

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**From:** Edelstein, Rebecca [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9549E6E2F43E4A3C88CC3BEA8F7220F5-REBECCA L EDELSTEIN]  
**Sent:** 5/21/2019 1:55:22 PM  
**To:** Kelly Mayo [kmayo@knoellusa.com]  
**Subject:** RE: EPA Review of PMN P-16-0541

Kelly,

Thanks for the heads-up on this and for your voicemail message. Greg and I are working with Chris to try to get this resolved.

Rebecca Edelstein, Ph.D.  
Team Leader, Pre-Notice and Exemptions Management Team  
Chemical Control Division  
Office of Pollution Prevention and Toxics  
US Environmental Protection Agency  
WJC EPA East Building, room 4419A  
1200 Pennsylvania Avenue, NW (7405M)  
Washington, DC 20460

Phone: 202-564-1667 (please note new phone number)  
FAX: 202-564-9490

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**From:** Kelly Mayo <kmayo@knoellusa.com>  
**Sent:** Monday, May 20, 2019 6:23 PM  
**To:** Buckley, Christopher <buckley.christopher@epa.gov>; Edelstein, Rebecca <Edelstein.Rebecca@epa.gov>  
**Subject:** EPA Review of PMN P-16-0541

Hi Chris,

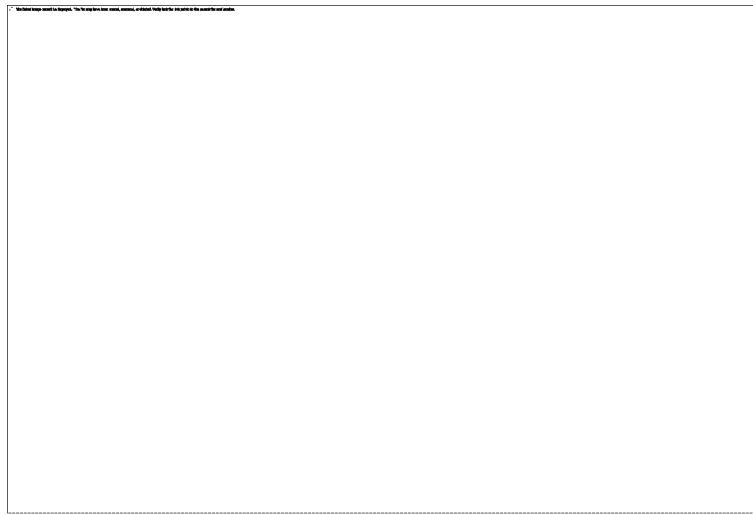
It has been over a month since we have corresponded on this case and I just left you a voicemail asking for resolution. We have not been approving any suspensions for this case as is requested under TSCA, so I am not sure how the case is still lingering with no conclusion by the EPA on a regulatory outcome.

As I mentioned, if we don't hear back in a few days I will be elevating this case to upper management given the extreme amount of time the review has been ongoing and the fact that we provided all supplemental information needed back in August of 2018. Again, this no longer fits the "lung toxicity" category and even if it did, the chemical is never made as a powder to make inhalation a relevant route of concern. Also, I requested follow-up on the ecotox risk concern calculations, but never heard back from you.

Please give me a call back as soon as possible so we can discuss the EPA conclusion for this case.

-Kelly

Kelly E. Mayo-Bean  
Senior Regulatory Scientist  
knoell USA, LLC  
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Phone: +1-610-558-3001 ext. 163  
Fax: 610.558.6025



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**From:** Buckley, Christopher [<mailto:buckley.christopher@epa.gov>]  
**Sent:** Wednesday, April 10, 2019 5:27 PM  
**To:** Kelly Mayo <[kmayo@knoellusa.com](mailto:kmayo@knoellusa.com)>  
**Cc:** [james@soichem.com](mailto:james@soichem.com)  
**Subject:** RE: PMN Update

Yes, it's been reviewed. However, the ecotoxicity assessment stands as is. I'll follow up with additional detail.

Thanks,  
G. G. Buckley

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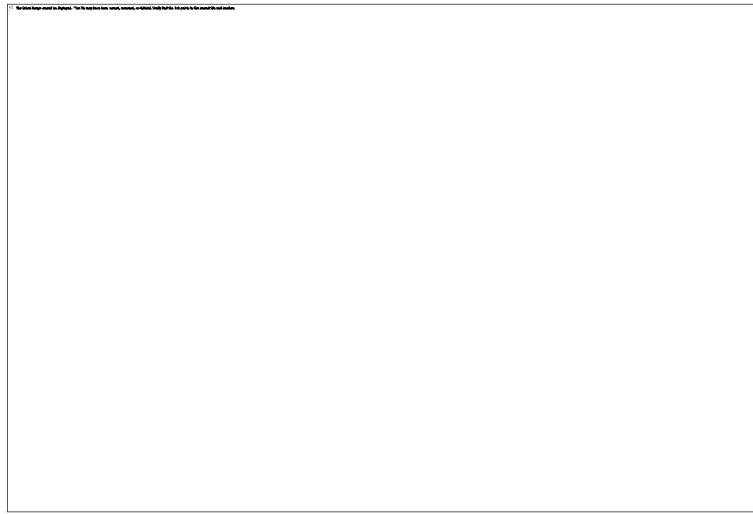
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**From:** Kelly Mayo <[kmayo@knoellusa.com](mailto:kmayo@knoellusa.com)>  
**Sent:** Tuesday, April 09, 2019 3:31 PM  
**To:** Buckley, Christopher <[buckley.christopher@epa.gov](mailto:buckley.christopher@epa.gov)>  
**Cc:** [james@soichem.com](mailto:james@soichem.com)  
**Subject:** RE: PMN Update

Hi Chris,

Any progress on the adjustment of the exposure numbers for phosphate content per your note below? Also, I wanted to know how inhalation exposure was still occurring if the chemical was not volatile and not in a powder form? Were you able to follow up on that as well? Feel free to give me a call if that is easier.

Kelly E. Mayo-Bean  
Senior Regulatory Scientist  
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Phone: +1-610-558-3001 ext. 163  
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**From:** Buckley, Christopher [<mailto:buckley.christopher@epa.gov>]  
**Sent:** Monday, April 1, 2019 12:14 PM  
**To:** Kelly Mayo <[kmayo@knoellusa.com](mailto:kmayo@knoellusa.com)>  
**Cc:** [james@soichem.com](mailto:james@soichem.com)  
**Subject:** RE: PMN Update

Good Afternoon Kelly,

It didn't appear that any adjustments were made for the phosphate content. I noticed that Friday. I asked for clarification and have arranged a meeting with RAD Reps to have it reevaluated.

Thanks,  
C. G. Buckley

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**From:** Kelly Mayo <[kmayo@knoellusa.com](mailto:kmayo@knoellusa.com)>  
**Sent:** Monday, April 01, 2019 11:53 AM  
**To:** Buckley, Christopher <[buckley.christopher@epa.gov](mailto:buckley.christopher@epa.gov)>  
**Cc:** [james@soichem.com](mailto:james@soichem.com)  
**Subject:** RE: PMN Update

Hi Chris,

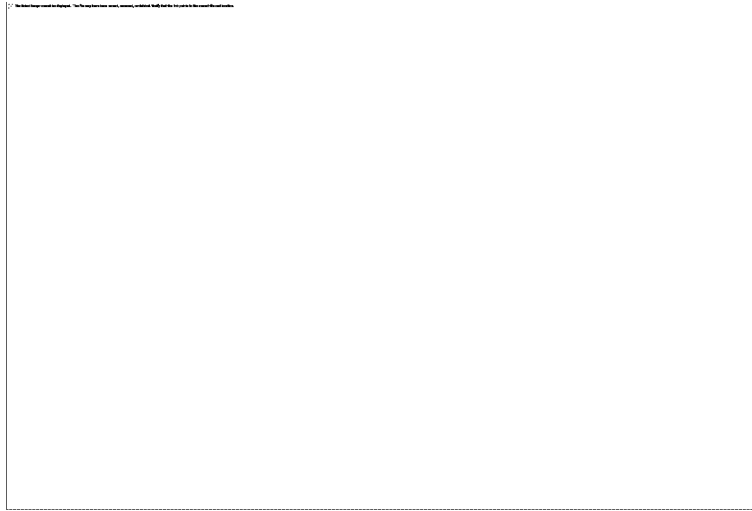
Thanks for the update. Can you please send over the reports to the fax number below so that I can review them. The chemical is never made in powder form and is not volatile, so I would like to confirm where the inhalation is coming from.

Also I would like to confirm the environmental releases have been adjusted for phosphate content prior to the risk calculation.

Thanks,  
Kelly

Fax: 610.558.6025

Kelly E. Mayo-Bean  
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**From:** Buckley, Christopher [<mailto:buckley.christopher@epa.gov>]  
**Sent:** Friday, March 29, 2019 4:01 PM  
**To:** Kelly Mayo <[kmayo@knoellusa.com](mailto:kmayo@knoellusa.com)>  
**Cc:** [james@soichem.com](mailto:james@soichem.com)  
**Subject:** PMN Update

Good Afternoon Kelly,

I received the exposure report for the PMN on Monday. There are still significant water and land fill releases and some worker inhalation exposure that need to be addressed. We may be able to manage the Inhalation concerns with PPE under our updated directions but I will need to get a health assessment to establish an APF. If it helps you in addressing this concerns, I can fax you over a copy of the reports for your review and we can have a discussion.

Please feel free to contact me with any questions or concerns.

Thanks and Very Respectfully,  
C. G. Buckley

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